



January 28, 2019

Jean Thurston
Bureau of Ocean Energy Management
Office of Strategic Resources
760 Paseo Camarillo, Suite 102
Camarillo, California 93010

Ms. Thurston:

EDPR Offshore North America LLC, a limited liability company organized under the laws of the State of Delaware, respectfully submits these comments and the information herein in response to the Bureau of Ocean Energy Management's (BOEM) Call for Information and Nominations for Commercial Leasing for Wind Power Development on the Outer Continental Shelf ("OCS") offshore California, issued as Docket Number: 2018-0045 (the "Call"). EDPR Offshore (Company Number: 15074) has been fully qualified by BOEM to hold an Outer Continental Lease. Capitalized terms used herein and not otherwise defined in this response have the meanings set forth in the Call.

We would like to commend BOEM on recent successes in developing the offshore wind industry in the United States as well as BOEM's efforts to involve all stakeholders during the different planning stages of the leasing process in efforts to advance responsible development of offshore wind energy on the OCS. EDPR is grateful for the opportunity to offer these comments and looks forward to continued engagement with BOEM.

I. About EDPR Offshore North America LLC

EDPR Offshore is a wholly-owned subsidiary of EDP Renewables North America LLC, a limited liability company organized under the laws of the State of Delaware ("EDPR NA"). EDPR NA is a direct, wholly owned subsidiary of EDP Renováveis, S.A., a Spanish *sociedad anonima* ("EDPR SA"), whose majority shareholder, EDP-Energias de Portugal, Sociedade Anónima, Sucursal em Espanha ("EDP-Spanish Branch") is the Spanish branch of EDP-Energias de Portugal ("EDP"), a vertically-integrated utility company with a firmly established position in the global energy market. Given this ownership structure, and for the sake of simplicity, all companies owned by the parent company, EDP SA together with EDPR NA and EDPR Offshore will be referred to as "EDPR" in this letter.

Headquartered in Lisbon, Portugal, EDP is the largest generator, distributor and supplier of electricity in Portugal, the third largest energy company in the Iberian Peninsula, and the largest Portuguese group by market capitalization (over \$11 billion). EDP holds, through direct and indirect ownership, significant electricity generation and distribution companies, gas supply and distribution companies, and a number of other energy and non-energy related business ventures in Europe, Brazil, Mexico and the United States.



Worldwide, EDP has more than 26 GW of installed electricity generation capacity and 10.8 million electricity and gas clients.

EDPR SA is a leading global renewable energy company that develops, builds, owns and operates power plants that generate electricity using renewable energy sources. EDPR SA operates in three broad geographic areas: Europe, North America and South America. Specifically, it currently owns and operates (directly or indirectly through one or more of its subsidiaries) wind and solar farms in 13 countries: Spain, Portugal, France, Belgium, Poland, Romania, Italy, the United States of America, the United Kingdom, Greece, Mexico, Canada and Brazil; it has various offshore and onshore wind, solar and energy storage projects in varied stages of development and construction in various markets, and it is actively engaged in expanding its activities into other countries and technologies. With more than 11 GW of installed wind capacity and close to 28TWh generated as of YE 2017, EDPR is ranked fourth in the world in wind energy based on net installed capacity and is consistently ranked in the top three in terms of sectorial growth.

EDPR NA, a wholly owned subsidiary of EDP SA, develops, constructs, owns and operates (directly or indirectly) wind and solar renewable energy projects throughout the U.S. (including California), Canada and Mexico. EDPR NA is based in Houston, Texas, with more than 600 employees and regional offices in New York, Oregon, Illinois and Massachusetts. EDPR NA's rigorous approach has led to the successful development of more than 6 GW of renewable energy facilities located in the U.S., and the company has demonstrated a proven ability to successfully navigate complicated land, interconnection and permitting environments in order to achieve commercial operations for its projects.

EDPR operational assets, 48 wind farms and five solar parks, are spread across 14 U.S. states, one Mexican state and one Canadian province, making EDPR NA the fourth largest operator of wind energy based on net installed capacity in the United States. EDPR NA is an industry leader in operational reliability: with nearly 3,000 turbines in operation and drawing on more than 200 million hours of operational history at its wind farms and solar parks, EDPR NA is able to maintain a rate of more than 97% availability fleet-wide. EDPR NA is also actively developing a portfolio of more than 10,000 MW of additional renewable energy assets in more than 15 states in the U.S.

Together with Principle Power, Inc. ("Principle Power"), EDPR developed a full-scale floating offshore wind prototype called WindFloat 1, which was installed 5 kilometers offshore in Portugal in 2011. In five years of operation, the prototype delivered more than 17.5 GWh of electricity to the grid and survived waves of up to 17 meters while maintaining reliable performance and without sustaining any structural damage. After successfully sponsoring the WindFloat 1 project, EDPR swiftly progressed into the pre-commercial phase of floating technology and is developing two offshore floating wind energy projects located in France (Les Éoliennes Flottantes du Golfe du Lyon) and in Portugal (WindFloat Atlantic). In the U.S., EDPR is working together with the Redwood Coast Energy Authority ("RCEA"), Principle Power and Aker Solutions Inc. ("Aker") to develop the Redwood Coast Offshore Wind Project, a 100-150 MW offshore



floating wind project to be sited off the coast of Humboldt County, CA. In September 2018, RCEA submitted an Unsolicited Application for an Outer Continental Shelf Renewable Energy Commercial Lease under 30 CFR 585.230 for a commercial wind energy lease within what is now the Humboldt Call Area.

In addition to these floating wind energy projects, EDPR is also sponsoring the development of more than 3 GW of non-floating offshore wind energy projects in France, the United Kingdom, and more recently, the U.S. East Coast.

II. Nominations for a Commercial Wind Energy Lease

EDPR believes that an appropriately scaled project is the optimal first step to accessing local carbon-free renewable electricity off Humboldt County and kicking off the California offshore wind industry. At the same time, we stress the critical importance of developing areas in Central California to achieve the scale necessary for a sustainable industry. Further, California’s goal to fully rely on carbon-free electricity by 2045, mandated by SB100 and signed by Governor Jerry Brown in September 2018, will require a significant contribution from offshore wind.

EDPR has engaged in discussions with the BOEM/California Intergovernmental Renewable Energy Task Force, California Energy Commission, Department of Defense and other key stakeholders. While at this stage we do not have any evidence to believe the Central Coast Call Areas could not be fully commercially viable, further studies are needed. With that in mind, EDPR is submitting nominations within the Morro Bay and Diablo Canyon Call Areas with the objective of developing multiple floating offshore wind projects. EDPR anticipates following BOEM’s development timeline and has initiated desktop assessments in order to characterize the site conditions. Through these efforts and our engagement with key stakeholders, we anticipate further refining our proposed area of interest. Our preliminary areas of interest include the following blocks:

a. Morro Bay Call Area

Morro Bay Call Area			
Protraction name	Protraction No.	Block No.	Sub-block
San Luis Obispo	NI10-03	6102	L, P.
San Luis Obispo	NI10-03	6103	M.
San Luis Obispo	NI10-03	6152	D, L, P.
San Luis Obispo	NI10-03	6153	A, B, E, F, I, J, K, M, N, O.
San Luis Obispo	NI10-03	6202	D, G, H, K, L, N, O, P.
San Luis Obispo	NI10-03	6203	All.
San Luis Obispo	NI10-03	6204	I, M.
San Luis Obispo	NI10-03	6251	D, H, K, L, O, P.
San Luis Obispo	NI10-03	6252	All.

Morro Bay Call Area			
Protraction name	Protraction No.	Block No.	Sub-block
San Luis Obispo	NI10-03	6253	All.
San Luis Obispo	NI10-03	6254	A, B, E, F, G, I, J, K, L, M, N, O, P.
San Luis Obispo	NI10-03	6301	C, D, G, H, K, L, M, O, P.
San Luis Obispo	NI10-03	6302	All.
San Luis Obispo	NI10-03	6303	All.
San Luis Obispo	NI10-03	6304	All.
San Luis Obispo	NI10-03	6305	A, E, I, M.
San Luis Obispo	NI10-03	6351	All.
San Luis Obispo	NI10-03	6352	All.
San Luis Obispo	NI10-03	6353	All.
San Luis Obispo	NI10-03	6354	All.
San Luis Obispo	NI10-03	6355	A, B, E, F, I, J, M, N.
San Luis Obispo	NI10-03	6401	All.
San Luis Obispo	NI10-03	6402	All.
San Luis Obispo	NI10-03	6403	All.
San Luis Obispo	NI10-03	6404	All.
San Luis Obispo	NI10-03	6405	A, B, E, F, G, I, J, K, L, M, N, O, P.
San Luis Obispo	NI10-03	6406	M.
San Luis Obispo	NI10-03	6451	A, B, C, D, E, F, G, H, I, J, K, L, N, O, P.
San Luis Obispo	NI10-03	6452	All.
San Luis Obispo	NI10-03	6453	All.
San Luis Obispo	NI10-03	6454	All.
San Luis Obispo	NI10-03	6455	All.
San Luis Obispo	NI10-03	6456	A, B, E, F, G, H, I, J, K, L, M, N, O, P.
San Luis Obispo	NI10-03	6457	E, F, I, J, M, N, O.
San Luis Obispo	NI10-03	6501	B, C, D, G, H.
San Luis Obispo	NI10-03	6502	A, B, C, D, E, F, G, H, I, J, K, L.
San Luis Obispo	NI10-03	6503	A, B, C, D, E, F, G, H, I, K, L.
San Luis Obispo	NI10-03	6504	All.
San Luis Obispo	NI10-03	6505	All.
San Luis Obispo	NI10-03	6506	All.
San Luis Obispo	NI10-03	6507	All.
San Luis Obispo	NI10-03	6508	I, M, N.
San Luis Obispo	NI10-03	6554	D.
San Luis Obispo	NI10-03	6555	A, B, C, D, G, H.
San Luis Obispo	NI10-03	6556	A, B, C, D, E, F, G, H.
San Luis Obispo	NI10-03	6557	A, B, C, D, E, F, G, H.
San Luis Obispo	NI10-03	6558	A, B, C, E, F, G, H.
Sur Canyon	NI10-02	6340	O, P.

Morro Bay Call Area			
Protraction name	Protraction No.	Block No.	Sub-block
Sur Canyon	NI10-02	6390	B, C, D, F, G, H, J, K, L, M, N, O, P.
Sur Canyon	NI10-02	6440	A, B, C, D, F, G, H, J, K, L, N, O, P.
Sur Canyon	NI10-02	6490	C, D, H.

b. Diablo Canyon Call Area

Diablo Canyon Call Area			
Protraction name	Protraction No.	Block No.	Sub-block
San Luis Obispo	NI10-03	6756	M, N, O, P.
San Luis Obispo	NI10-03	6757	M, N, O, P.
San Luis Obispo	NI10-03	6758	M, N, O, P.
San Luis Obispo	NI10-03	6759	M, N, O, P.
San Luis Obispo	NI10-03	6760	M, N, O, P.
San Luis Obispo	NI10-03	6761	M, N, O, P.
San Luis Obispo	NI10-03	6762	M, N, O, P.
San Luis Obispo	NI10-03	6763	M, N, O, P.
San Luis Obispo	NI10-03	6764	M.
San Luis Obispo	NI10-03	6806	A, B, C, D, F, G, H, J, K, L, N, O, P.
San Luis Obispo	NI10-03	6807	All.
San Luis Obispo	NI10-03	6808	All.
San Luis Obispo	NI10-03	6809	All.
San Luis Obispo	NI10-03	6810	All.
San Luis Obispo	NI10-03	6811	All.
San Luis Obispo	NI10-03	6812	All.
San Luis Obispo	NI10-03	6813	All.
San Luis Obispo	NI10-03	6814	A, E, I, M.
San Luis Obispo	NI10-03	6856	C, D, G, H, K, L, P.
San Luis Obispo	NI10-03	6857	All.
San Luis Obispo	NI10-03	6858	All.
San Luis Obispo	NI10-03	6859	All.
San Luis Obispo	NI10-03	6860	All.
San Luis Obispo	NI10-03	6861	All.
San Luis Obispo	NI10-03	6862	All.
San Luis Obispo	NI10-03	6863	All.
San Luis Obispo	NI10-03	6864	A, B, E, F, I, J, M, N.
San Luis Obispo	NI10-03	6906	D, H.
San Luis Obispo	NI10-03	6907	All.
San Luis Obispo	NI10-03	6908	All.
San Luis Obispo	NI10-03	6909	All.

Diablo Canyon Call Area			
Protraction name	Protraction No.	Block No.	Sub-block
San Luis Obispo	NI10-03	6910	All.
San Luis Obispo	NI10-03	6911	All.
San Luis Obispo	NI10-03	6912	All.
San Luis Obispo	NI10-03	6913	All.
San Luis Obispo	NI10-03	6914	A, B, C, E, F, G, I, J, K, M, N, O, P.
San Luis Obispo	NI10-03	6957	A, B, C, D, E, F, G, H, J, K, L, N, O, P.
San Luis Obispo	NI10-03	6958	All.
San Luis Obispo	NI10-03	6959	All.
San Luis Obispo	NI10-03	6960	All.
San Luis Obispo	NI10-03	6961	All.
San Luis Obispo	NI10-03	6962	All.
San Luis Obispo	NI10-03	6963	All.
San Luis Obispo	NI10-03	6964	All.
San Luis Obispo	NI10-03	6965	A, E, F, I, J, K, M, N, O.
San Luis Obispo	NI10-03	7007	C, D, H.
San Luis Obispo	NI10-03	7008	All.
San Luis Obispo	NI10-03	7009	All.
San Luis Obispo	NI10-03	7010	All.
San Luis Obispo	NI10-03	7011	All.
San Luis Obispo	NI10-03	7012	All.
San Luis Obispo	NI10-03	7013	All.
San Luis Obispo	NI10-03	7014	All.
San Luis Obispo	NI10-03	7015	All.
San Luis Obispo	NI10-03	7016	I, M.
San Luis Obispo	NI10-03	7058	A, B, C, D, F, G, H, J, K, L, O, P.
San Luis Obispo	NI10-03	7059	All.
San Luis Obispo	NI10-03	7060	All.
San Luis Obispo	NI10-03	7061	All.
San Luis Obispo	NI10-03	7062	All.
San Luis Obispo	NI10-03	7063	All.
San Luis Obispo	NI10-03	7064	All.
San Luis Obispo	NI10-03	7065	All.
San Luis Obispo	NI10-03	7066	A, E, I, M.
San Luis Obispo	NI10-03	7108	C, D, G, H, K, L, N, O, P.
San Luis Obispo	NI10-03	7109	All.
San Luis Obispo	NI10-03	7110	All.
San Luis Obispo	NI10-03	7111	All.
San Luis Obispo	NI10-03	7112	All.
San Luis Obispo	NI10-03	7113	All.



Diablo Canyon Call Area			
Protraction name	Protraction No.	Block No.	Sub-block
San Luis Obispo	NI10-03	7114	All.
San Luis Obispo	NI10-03	7115	All.
San Luis Obispo	NI10-03	7116	A, E, I, M.
Santa Maria	NI10-06	6008	B, C, D, F, G, H.
Santa Maria	NI10-06	6009	A, B, C, D, E, F, G, H.
Santa Maria	NI10-06	6010	A, B, C, D, E, F, G, H.
Santa Maria	NI10-06	6011	A, B, C, D, E, F, G, H.
Santa Maria	NI10-06	6012	A, B, C, D, E, F, G, H.
Santa Maria	NI10-06	6013	A, B, C, D, E, F, G, H.
Santa Maria	NI10-06	6014	A, B, C, D, E, F, G, H.
Santa Maria	NI10-06	6015	A, B, C, D, E, F, G, H.
Santa Maria	NI10-06	6016	A, E.

III. Conclusion

EDPR would like to once again commend BOEM on its efforts to involve all stakeholders during the different planning stages of the leasing process. We encourage BOEM to continue this critically important stakeholder engagement in particular through the BOEM/California Intergovernmental Renewable Energy Task Force and with officials at the Department of Defense to find a way to ensure that leasing for commercial scale offshore wind projects off the central coast be allowed to proceed. We look forward to continuing to work together to advance the responsible development of offshore wind on the California OCS.

Sincerely,

A handwritten signature in black ink, appearing to read 'AUR' with a stylized flourish underneath.

Enrique Alvarez-Uria
Director, Offshore Wind Development
EDPR Offshore North America LLC